

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Judd Eliasoph, individually and on behalf
of all those similarly situated,

Plaintiff,

v.

LG-Philips LCD Co. Ltd., LG Philips LCD
America, Inc.; Samsung Electronics Co.
Ltd.; Sharp Corporation; Sharp Electronics
Corporation; Toshiba Corporation Toshiba
Matsushita Display Technology Co., Ltd.;
Hitachi Ltd.; Hitachi Displays, Ltd.;
Hitachi America Ltd.; Hitachi Electronic
Devices (USA), Inc.; Sanyo Epson Imaging
Devices Corporation; NEC Corporation;
NEC LCD Technologies, Ltd.; NEC
Electronics America, Inc.; IDT
International Ltd.; AU Optronics;
International Display Technology Co.,
Ltd.; International Display Technology
USA Inc.; AU Optronics Corporation
America; Chi Mei Optoelectronics; Chi
Mei Optoelectronics USA, Inc.; Chunghwa
Picture Tubes Ltd.; Hannstar Display
Corporation,

Defendants.

Case No. C-06-7588 SI

**STIPULATION AND ORDER FOR
EXTENSION OF TIME**

Honorable Susan Illston

STIPULATION FOR EXTENSION OF TIME

WHEREAS plaintiff filed a complaint in the above-captioned case on or about December 12, 2006;

WHEREAS plaintiff alleges antitrust violations by manufacturers of Liquid Crystal Display ("LCD") products;

WHEREAS more than fifteen complaints have been filed to date in federal district courts throughout the United States by plaintiffs purporting to bringing class actions on behalf of indirect purchasers alleging antitrust violations by manufacturers of LCD products (collectively, "the LCD Cases");

WHEREAS there is a motion pending before the Judicial Panel on Multidistrict Litigation to transfer the LCD Cases to the Northern District of California for coordinated or consolidated pretrial proceedings pursuant to 28 U.S.C. § 1407;

WHEREAS plaintiff anticipates the possibility of Consolidated Amended Complaints in the LCD Cases;

WHEREAS plaintiff and Hitachi America, Ltd. ("HAL") and Hitachi Electronic Devices (USA), Inc. ("HED-US") have agreed that an orderly schedule for any response to the pleadings in the LCD Cases would be more efficient for the parties and for the Court;

WHEREAS plaintiff agrees that the deadline for HAL and HED-US to respond to the Complaint shall be extended until the earlier of the following two dates: (1) forty-five days after the filing of a Consolidated Amended Complaint in the LCD Cases; or (2) forty-five days after plaintiff provided written notice to HAL and HED-US that plaintiff does not intend to file a Consolidated Amended Complaint, provided that such notice may be given only after the initial case management conference in the MDL transferee court in this case;

WHEREAS plaintiff further agrees that this extension is available, without further stipulation with counsel for plaintiff, to all named defendants who notify plaintiff in writing of their intention to join this extension;

WHEREAS this Stipulation does not constitute a waiver by HAL and HED-US or any defendant of any defense, including but not limited to the defenses of lack of personal or subject

matter jurisdiction, insufficiency of process, insufficiency of service of process, or improper venue.

PLAINTIFF AND DEFENDANTS HAL AND HED-US, BY AND THROUGH THEIR RESPECTIVE COUNSEL OF RECORD, HEREBY STIPULATE AS FOLLOWS:

1. The deadline for the HAL and HED-US to respond to the Complaint shall be extended until the earlier of the following two dates (1) forty-five days after the filing of a Consolidated Amended Complaint in the LCD Cases; or (2) forty-five days after the plaintiff provides written notice that he does not intend to file a Consolidated Amended Complaint, provided that such notice may be given only after the initial case management conference in the MDL transferee court in this case.

2. This extension is available, without further stipulation with counsel for plaintiff or further order of the Court, to all named defendants who notify plaintiff in writing of their intention to join this extension.

IT IS SO STIPULATED.

Dated: January 5, 2007

Signature: [Signature]

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Counsel for Plaintiff Judd Eliasoph

SO ORDERED:

[Signature]

Dated: January 5, 2007

Signature: William J. Taylor

Kent M. Roger
William J. Taylor
Morgan, Lewis & Bockius LLP
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San Francisco, CA 94105-1126

Counsel for Defendants
Hitachi America, Ltd. and Hitachi Electronic
Devices (USA), Inc.